



June 30, 2021

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VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Clerk

South Carolina Public Service Commission
101 Executive Center Dr., Suite 100
Columbia, SC 29210

RE: Assurance Wireless of South Carolina, LLC 2020 Annual Report
Docket No. 2021-14-C

Dear Jocelyn:

Enclosed please find Assurance Wireless of South Carolina, LLC's 2020 Annual Eligible Telecommunications Carrier Report ("Annual Report").

The Annual Report contains confidential information, and has been redacted. Pursuant to Commission Orders issued in Docket 2005-83-A, a confidential version of the Annual Report is being delivered to the Commission, and the confidential information will be appropriately marked in that unredacted version.

If you have any questions, please do not hesitate to contact me.

Yours truly,

s/John J. Pringle, Jr.
John J. Pringle, Jr.

Cc: Office of Regulatory Staff

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2021-14-C

**ASSURANCE WIRELESS' ANNUAL
ELIGIBLE TELECOMMUNICATIONS CARRIER REPORT**

June 30, 2021

I. INTRODUCTION

Assurance Wireless of South Carolina, LLC (“Assurance Wireless” or “Company”) submits this Annual Report, pursuant to Order No. 2011-76, and respectfully requests the Commission certify its eligibility for low-cost support from the federal Universal Service Fund for calendar year 2021. Assurance Wireless is a wholly-owned subsidiary of Sprint Corporation (“Sprint”), which is owned by T-Mobile USA, Inc. Because Assurance Wireless is the designated Eligible Telecommunications Carrier (“ETC”) in South Carolina, references in this filing are to “Assurance Wireless.”

Assurance Wireless is a competitive carrier that has been designated as an ETC solely for purposes of offering prepaid wireless telecommunications services supported by the Lifeline program. Its ETC designation does not entitle it to receive high-cost support from the federal Universal Service Fund.

In 10 S.C. Code Ann. Regs. 103-690.1, the Commission specifies its annual reporting requirements for ETCs. Please find herein information responsive to those requirements.

II. COMPLIANCE WITH CTIA CONSUMER CODE FOR WIRELESS SERVICE AND OTHER SERVICE QUALITY AND CONSUMER PROTECTION RULES

The Commission requires a wireless ETC to certify that it is complying with all applicable service quality standards and consumer protection rules, e.g., the CTIA Consumer Code for Wireless Service.¹ Assurance Wireless became a voluntary signatory to the Consumer Code in 2004. Since adopting the Consumer Code, Assurance Wireless and its affiliates have implemented the policies and practices required of signatories. This means that Assurance Wireless has implemented policies so that it:

- (1) Discloses rates and terms of service to consumers.

¹ 10 S.C. Code Ann. Regs. 103-690.1(B)(a), 103-690.1(B)(b)(5).

- (2) Makes available maps showing where service is generally available.
- (3) Provides contract terms to customers and confirms changes in service.
- (4) Allows a trial period for new service.
- (5) Provides specific disclosures in advertising.
- (6) Separately identifies carrier charges from taxes on billing statements.
- (7) Provides customers the right to terminate service for material changes to contract terms.
- (8) Provides ready access to customer service.
- (9) Promptly responds to consumer inquiries and complaints received from government agencies.
- (10) Abides by policies for protection of customer privacy.

Assurance Wireless certifies that it is in compliance with all applicable service quality and consumer protection requirements and standards, including the CTIA Consumer Code for Wireless Service. A copy of CTIA's most recent certification issued to T-Mobile is included as **Attachment 1**. Assurance Wireless has complied and will continue to comply with the principles set forth therein.

III. ASSURANCE WIRELESS' LIFELINE REPORTING

A. Assurance Wireless' Unfulfilled Requests For Service

An ETC must make an annual report of the number of requests for service from potential customers within its service areas that were unfulfilled for the most recent calendar year.² The filing must also detail how it attempted to provide service to those potential customers. Assurance Wireless did not have any unfulfilled requests for service from qualified applicants in 2020.

B. Assurance Wireless' Complaints Per 1,000 Handsets Or Lines

The Commission requires an ETC to annually report the total number of complaints and number of complaints per 1,000 handsets or lines for the most recent calendar year.³ Assurance

² 10 S.C. Code Ann. Regs. 103-690.1(B)(b)(3).

³ 10 S.C. Code Ann. Regs. 103-690.1(B)(b)(4).

Wireless had **BEGIN CONFIDENTIAL** [REDACTED] **END**
CONFIDENTIAL for the 2020 calendar year.

C. Assurance Wireless' Certification Regarding Emergency Functionality

The Commission requires an ETC to certify that it is able to function in emergency situations.⁴ Assurance Wireless, an affiliate of T-Mobile USA, provides service using the T-Mobile USA network and certifies that it is able to remain functional in emergency situations based on FCC Rule 54.202(a)(2). T-Mobile USA has a detailed Business Continuity Program that meets this requirement. The Business Continuity Program is the framework in which T-Mobile USA sets policies for network resiliency, the development and conduct of emergency preparedness exercises and the formation of its Emergency Response Team. The latest iteration of the "Emergency Operations Plan" document, which demonstrates T-Mobile's ability to remain functional in emergencies, is attached as **Attachment 2**.

D. Assurance Wireless' Certification Regarding Its Provision Of A Comparable Local Usage Plan

The Commission requires an ETC to certify that it has a local usage plan comparable to the incumbent LEC in the relevant service area.⁵ Assurance Wireless's bundled Lifeline service offering provides new eligible customers with 1,000 anytime prepaid minutes, unlimited texts and 4.5 GB of data each month at no charge. Each service plan also includes voicemail, caller ID and call waiting services at no additional charge. Customers are also able to purchase a wide selection of data packs and bundled minute and data offers which provide additional minutes and/or data to meet their needs for additional voice or data usage. Accordingly, Assurance Wireless offers a

⁴ 10 S.C. Code Ann. Regs. 103-690.1(B)(b)(6)

⁵ 10 S.C. Code Ann. Regs. 103-690.1(B)(b)(7)

variety of plans in South Carolina that do not have a limited calling scope. Assurance Wireless certifies that it offers a local usage plan comparable to the incumbent LEC in relevant service areas in South Carolina.

E. Assurance Wireless' Certification Regarding The Requirement To Provide Equal Access

Assurance Wireless understands that the Commission is willing to waive the equal access requirement of Regulation 103- 690.C.(a)(5), which requires an applicant to acknowledge that the FCC “may require” it to offer equal access to long distance carriers. Assurance Wireless requests that the Commission waive this requirement. The Commission’s ETC regulations generally track the corresponding federal ETC regulations, but equal access is no longer a requirement under the FCC’s universal service rules previously existing under 47 C.F.R. § 54.202(a)(5).⁶

F. Number of Lifeline Customers

The Commission requires ETCs to inform it of the number of customers receiving service in the prior year.⁷ Assurance Wireless had 34,963 customers as of December 31, 2020.

G. Copies of Responses to Lifeline Verification Survey or Certification filed with USAC

The Commission requires ETCs to file copies of responses to the Lifeline Verification Survey or Certification filed with the Universal Service Administrative Company (“USAC”) each year.⁸ Attached as **Attachment 3**, please find a copy of Assurance Wireless’s most recent Lifeline Verification Survey or Certification filed with USAC.

⁶ See *Order Designating CarolinaConnect Cooperative, Inc. as an Eligible Telecommunications Carrier*, Docket No. 2021-15-C; June 3, 2021.

⁷ 10 S.C. Code Ann. Regs. 103-690.1(B)(b)(9)

⁸ 10 S.C. Code Ann. Regs. 103-690.1(B)(b)(10)

IV. CONCLUSION

Assurance Wireless respectfully requests that the Commission certify the Company's eligibility to receive low-income universal service funds in accordance with 47 C.F.R. § 54.401.

Respectfully submitted,

s/John J. Pringle, Jr.

John J. Pringle, Jr.

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Counsel for Assurance Wireless

cc: Office of Regulatory Staff

Attachment 1



September 16, 2020

Mr. Neville Ray
President, Technology
T-Mobile USA
12920 SE 38th Street
Bellevue, WA 98006-1350

Dear Neville:

Congratulations! This letter is to notify you that T-Mobile USA and Metro by T-Mobile ("T-Mobile") have completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period January 1, 2020 – December 31, 2020, and is deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, T-Mobile is authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of T-Mobile review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. We are providing two specimens (color and black/white) of the Seal for T-Mobile's use on its website or collateral materials. If you should have any questions concerning the recertification process or use of the Seal, please contact Kathryn Dall'Asta, CTIA's Deputy General Counsel, at (202) 736-3677 or kdallasta@ctia.org.

CTIA commends T-Mobile for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with T-Mobile on this important industry initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Baker", followed by a horizontal line.

Meredith Attwell Baker
President & Chief Executive Officer

c.c. Dave Miller, General Counsel
Molly Malouf, Senior Director, Legal Affairs
Andrea Talaga, Paralegal, Marketing Communications

Attachment



CONSUMER CODE FOR WIRELESS SERVICE

SEAL OF WIRELESS QUALITY

TERMS OF USE (2020)

Subject to your compliance with the terms of use contained herein ("**Terms**"), CTIA-The Wireless Association ("**CTIA**") hereby grants your organization ("**Company**") a non-exclusive, world-wide, royalty-free license ("**License**") to use CTIA's Seal of Wireless Quality ("**Seal**") to represent that Company voluntarily adopts and adheres to the CTIA Consumer Code for Wireless Service for 2020 ("**Voluntary Consumer Code**") and has certified such to CTIA. The Seal is attached hereto at Exhibit A and fully incorporated herein by reference.

This License shall become effective immediately upon the date of your receipt of CTIA's written acknowledgement of Company's certification. CTIA permits the use of the Seal, solely in connection with the Voluntary Consumer Code program. Company may use the Seal in Company's advertising, promotional materials, other literature, or on Company's website(s) to indicate its voluntary compliance with the Voluntary Consumer Code.

Use of the Seal shall not be misleading as to the extent of Company's voluntary support and participation in the Voluntary Consumer Code program. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon the written request of CTIA. Company shall immediately cease use of the Seal upon receipt of CTIA's written notice to do so. If at any time, Company's practices and policies fail to comply, or CTIA has reason to believe that such practices and policies fail to comply with the Voluntary Consumer Code, Company will cease use of the Seal and all rights and permissions will immediately revert to CTIA.

Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the Voluntary Consumer Code.

Use of the Seal for other purposes than those stated in these Terms is an unauthorized use of the Seal and is strictly prohibited.

This License may be renewed annually subject to Company's successful completion of the certification process.

Use of the Seal constitutes acceptance of these legal terms and conditions.

EXHIBIT A



Attachment 2

EMERGENCY OPERATIONS PLAN

T-Mobile is able to function in emergency situations as set forth in Section 54.201(a)(2), which includes “a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”¹ In particular, T-Mobile has the following capabilities to remain functional in emergency situations:

- Availability of fixed and portable back-up power generators at various network locations throughout T-Mobile’s network that can be deployed in emergency situations.
- Ability to reroute traffic around damaged or out-of-service facilities through the deployment of cell-on-wheels (“COWs”), redundant facilities, and dynamic rerouting of traffic over alternate facilities.
- A network control center that monitors network traffic and anticipates traffic spikes, and can then (i) deploy network facilities to accommodate capacity needs, (ii) change call routing translations, and (iii) deploy COWs to temporarily meet traffic needs until longer-term solutions, such as additional capacity and antenna towers can be deployed.
- The majority of sites not equipped with fixed generators have battery back-up systems installed to maintain service in the event of a widespread power outage.

¹ 47 C.F.R. § 54.202(a)(2).

T-Mobile USA Business Continuity Program Summary

T-Mobile USA, Inc. ("T-Mobile") is committed to safeguarding the interests of our customers, employees and stakeholders in the event of an emergency or significant business disruption. As a result T-Mobile has and maintains an enterprise-wide Business Continuity Program designed to provide effective responses to a wide variety of disruptive events. T-Mobile's Business Continuity Program is centralized in its design and decentralized in its implementation, promoting active involvement in the program by all lines of business in all locations.

Primary components of the T-Mobile Business Continuity Program include:

- Enterprise Business Continuity Project Initiation and Oversight
- Risk Evaluation and Controls
- Business Impact Assessment and Analysis
- Business Continuity and Disaster Recovery Strategic Direction
- Crisis Response, Emergency Response, and Operations
- Business Continuity Plan Development, Maintenance, and Exercising
- Awareness and Training Programs
- Public Relations and Crisis Response and Resumption Coordination
- Coordination with External Agencies

A team of certified Business Continuity professionals is responsible for documenting and developing enterprise standards, processes, and policies for all business continuity and disaster recovery needs throughout T-Mobile. This group supports the line of business continuity planning and defines enterprise tools and methodologies. This level of consistency across the lines of business enhances T-Mobile's overall planning and resumption efforts.

T-Mobile also maintains backup and alternate power sources at mission critical locations, and has information processing and telecommunications back-up sites that provide redundancy that is important to protecting key business information and services. Business Continuity Plans are housed in a centralized online repository, accessible to employees in office and remotely through a web browser. Additionally, hard copies of plans are available at multiple sites throughout the enterprise.

The T-Mobile USA Business Continuity Program is designed and maintained to proactively mitigate the risk of threats to T-Mobile's customers, employees, and stakeholders. As such the program is revised and updated as needed to address potential and emerging hazards.

For more information on the T-Mobile Business Continuity Program, please send inquiries to:
business_continuity@t-mobile.com

Attachment 3

Annual Lifeline Eligible Telecommunications Carrier Certification Form All carriers must complete all or portions of all sections Form must be submitted to USAC and filed with the Federal Communications Commission

IMPORTANT: PLEASE READ INSTRUCTIONS FIRST

Deadline: January 31st (Annually)

249013		143033426
Study Area Code (SAC)		Service Provider Identification Number (SPIN)
(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each SAC through which it provides Lifeline service).		
2020	SC	Virgin Mobile USA LP
Recertification Year	State	ETC Name
Assurance Wireless		Sprint Corporation
DBA, Marketing, or Other Branding Name		Holding Company Name
(If same as ETC name, list "N/A" Do <u>not</u> leave blank)		(If same as ETC name, list "N/A" Do not leave blank)

Does the reporting company have affiliated ETCs?

Yes ☒

No ☐

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

Affiliated ETC's SAC	Affiliated ETC's Name
-- See attached worksheet --	

ETCs Subject to the Non-Usage Requirements

All ETCs must complete the appropriate check-box. ETCs that do not assess and collect a monthly fee from their Lifeline subscribers are subject to the non-usage requirements. ETCs subject to the non-usage requirements must indicate the number of subscribers de-enrolled by month in Section 4. ETCs that only assess a fee but do not collect such fees are subject to the non-usage requirements and must also indicate the number of subscribers de-enrolled by month.

Is the ETC subject to the non-usage requirements?

Yes ☒

No ☐

If yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	0
February	4115
March	5153
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Total Subscribers	9268

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

Initial Certification *All ETCs must complete this section*

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

LW
Initial _____

Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

Report the number of Lifeline subscribers due for recertification by month (January-December)

- A. Subscribers eligible for recertification by anniversary month
- B. Subscribers de-enrolled prior to recertification attempts
- C. Total number of subscribers ETC is responsible for recertifying (A-B)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
A.	21109	0	0	0	0	0	0	0	0	0	0	0	21109
B.	12784	0	0	0	0	0	0	0	0	0	0	0	12784
C.	8325	0	0	0	0	0	0	0	0	0	0	0	8325

Recertification Methods

State of federal database

- D. Subscribers recertified through ETC access to state or federal database by anniversary month

Report the number of eligible subscribers verified through access to a state or federal database.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
D.	0	0	0	0	0	0	0	0	0	0	0	0	0

- E. Name of the data source(s) used to verify consumer eligibility:

ETC Direct Contact

- F. Subscribers contacted by ETC directly to recertify (You may also use this section to report subscriber initiated recertifications).

Report the number of Lifeline subscribers the ETC contacted directly to obtain recertification of eligibility

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
F.	8325	0	0	0	0	0	0	0	0	0	0	0	8325

- G. Subscribers who failed to recertify through ETC direct outreach attempt

Report the number of Lifeline subscribers de-enrolled due to ineligibility or non-response to the ETC's outreach attempt.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
G.	297	0	0	0	0	0	0	0	0	0	0	0	297

H. Subscribers who recertified through ETC direct outreach attempt

Report the number of Lifeline subscribers that successfully recertified through ETC's outreach attempt.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
H.	8028	0	0	0	0	0	0	0	0	0	0	0	8028

Third Party

I. Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC

Report the number of Lifeline subscribers contacted by a state administrator, third party administrator, or USAC for the purpose of recertification.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
I.	0	0	0	0	0	0	0	0	0	0	0	0	0

J. Name of third party administrator used to verify subscriber eligibility:

K. Subscribers de-enrolled as a result of a third party recertification attempt

Report the number of subscribers as a result of ineligibility or non-response to outreach from a state administrator, third party administrator, or USAC.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
K.	0	0	0	0	0	0	0	0	0	0	0	0	0

L. Subscribers who recertified through a state administrator, third party administrator, or USAC's recertification effort

Report the number of subscribers that recertified through a request from a state administrator, third party administrator, or USAC

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
L.	0	0	0	0	0	0	0	0	0	0	0	0	0

Certification:

Recertification Method: Database

I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on a database. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial _____

Recertification Method: ETC

I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial LW

Recertification Method: Third Party

I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on an administrator. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial _____

No Subscribers

I certify that my company did not claim federal low income support for any Lifeline subscribers for the current Form 555 data year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial _____

$M = (G+K)$	$N = (D+F+I)$	$O = M/N \times 100$
Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled
297	8325	3.57%

Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,

Larry Weians, Vice President

Signature of Officer

larry.j.weians@sprint.com

Email Address of Officer

Andy M. Lancaster

Person Completing This Certification Form

Larry Weians, Vice President

Printed Name and Title of Officer

Feb 01, 2021

Date

913-762-6107

Contact Phone Number

Affiliated ETCs

[illegible]